



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 12 2004



REPLY TO THE ATTENTION OF

B-19J

Jo Carole Dawkins  
Dawkins Environmental Consulting  
P.O. Box 845  
Springville, Alabama 35146

Re: STB Finance Docket No. 34435, *Ameren Energy Generating Company - Construction and Operation Petition*

Dear Ms. Dawkins:

In accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (U.S. EPA) is responding to a scoping letter proposing the construction and operation of approximately 13 miles of new rail line in Montgomery County, Illinois.

Ameren Energy Generating Company (AEGC) is proposing to construct new rail line to connect AEGC's Coffeen Power Plant (Coffeen) with existing rail lines of the Burlington Northern and Santa Fe Railway (BNSF) and Union Pacific Railroad. Norfolk Southern Railway transports most of Coffeen's coal by way of trackage rights over a BNSF line. Proposed construction would provide AEGC with alternative rail access and increased options for transporting coal. Even though the rail line would be utilized to transport mainly coal, the line would be operated as a common carrier rail line giving other shippers the ability to request rail service. Based on the information provided, we offer the following comments.

#### **Cumulative Impacts Analysis**

A cumulative impacts analysis should include an analysis of direct and indirect impacts from past, present, and reasonably foreseeable future projects associated with the proposed project. This type of analysis aids in identifying the significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the impacts posed by the proposed project. Impacts should be assessed regardless of who initiates the project (e.g., increased business development, road development, increased demands on infrastructure). The cumulative impacts analysis should include, but not be limited to, wetlands impacts, soil erosion, sedimentation, diminished water quality, and diminished natural resources and loss of species habitat.

## **Affected Environment**

In order to assess potential significance of impacts to the environment from the proposed construction, the upcoming NEPA document needs to provide a detailed characterization of the surrounding environment. Since direct, indirect, and cumulative impacts to the environment should be assessed, this characterization should include a study area that is not limited to the foot print of the proposed rail line. The characterization should be descriptive and supported by visual details (e.g., legible figures, location maps, photographs) of the natural resources that could be affected directly or indirectly. This information should include, but not be limited to, the identification of all wetlands (i.e., location, types, acreage, functions, values), lakes, rivers/streams (i.e., water quality, their designated use), flood plains (i.e., acreage), watersheds, fish and wildlife, habitats, farmland, federal and state threatened and endangered species, and forest land in the proposed project area.

## **Environmental Impacts and Mitigation**

Information concerning the affected environment will be particularly important in evaluating effects and possible mitigatory measures of proposed actions (e.g., crossing of Coffeen Lake). Details regarding the widths of proposed water crossings and how crossing will be accomplished should be identified and discussed.

Impacts of the various alternatives on water quality should address, but not be limited to, a water body's designated use and compliance with State Water Quality Standards and Clean Water Act Section 401 Water Quality Certification. The upcoming NEPA documentation should discuss whether National Pollution Discharge Elimination System (NPDES) Section 402 storm water permits are required. All public and private water supply wells should be identified and impacts to these resources discussed and evaluated.

Upcoming documentation should also identify and discuss the potential impacts to air quality from construction and operation of the proposed rail line.

The upcoming NEPA document should identify and evaluate the impacts, if any, of the proposal on low income and/or minority communities (e.g., environmental justice communities) as compared to the general population. Also, any known sites or properties listed or eligible for listing in the National Register of Historic Places that may be impacted by the proposed construction should be described and mitigatory actions outlined. We request confirmation of these findings by the Illinois State Historic Preservation Office.

## **Best Management Practices**

Please include a discussion of best management practices that will be employed during construction covering the following topics:

- Storing and fueling of construction equipment;
- Prevention and/or control of spills (i.e., fuels, lubricants or other pollutants) from construction equipment;
- Revegetation of exposed soil following completion; and
- Bridge maintenance plans.

We appreciate the opportunity to review this proposal at such an early stage and hope this correspondence provides you with useful information. We look forward to receiving NEPA documentation this project. Should you have any questions, please do not hesitate to contact me or Kathleen Kowal of my staff at (312) 353-5206 or via e-mail at [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Kenneth A. Westlake', written in a cursive style.

Kenneth A. Westlake, Chief  
Environmental Planning and Evaluation Branch

cc: Victoria Rutson, Surface Transportation Board